EA Engineering, P.C.
EA Science and Technology

6712 Brooklawn Parkway, Suite 104
Syracuse, New York 13211-2158
Telephone: 315-431-4610
Fax: 315-431-4280
www.eaest.com

22 May 2017

Ms. Catherine McCabe
Regional Administrator
United States Environmental Protection Agency, Region 2
290 Broadway
New York, NY 10007-1866

RE: Self-Implementing PCB Remediation
USEPA ID Number NYD 003 907 045
Former Empire Electric Company
5200 1st Avenue
Brooklyn, NY 11232

Dear Ms. McCabe:

EA Engineering, P.C., and its affiliate EA Science and Technology (EA) are assisting the New York State Department of Environmental Conservation (NYSDEC) in executing the Self Implementing On-Site Cleanup and Disposal of PCB Remediation Waste at the former Empire Electric Company site, located at 5200 1st Avenue in Brooklyn, NY. The work is being performed under New York State's Superfund Program as an interim remedial measure (IRM) to facilitate a remedial investigation at the site.

In compliance with 40 CFR 761.61(a), EA transmitted the required Notice of Self Implementing On-Site Cleanup and Disposal of PCB Remediation Waste in October 2009. The Notice included a full site description, explanation of current site conditions, and the Basis of Design Report (BOD) which included Building Demolition Drawings. The October 30, 2009 correspondence was amended through submittal of additional information in correspondence from the NYSDEC dated May 27, 2010 and September 18, 2014. These documents will be referred to as the "Application". EPA provided an approval limited to the disposal of PCB waste, generated during the IRM removal work. This approval was received on September 23, 2014 via Article Number 7012 3460 0002 1646 0530.

The following are the objectives of this correspondence:

1. EA is notifying EPA on behalf of NYSDEC that previously inaccessible material has been uncovered and sampled in the performance of this IRM.
2. EA is informing EPA of a change in site conditions from information provided in the notification ("Application")
3. EA proposes a modification to EPA's September 23, 2014 approval, that the IRM being performed be considered the final cleanup of PCB remediation waste from the site.

1) Basement Rubble Material

The Demolition Drawings submitted to EPA were based on limited information regarding the structure's foundation. The structure included a network of column (pier) foundations that supported former steam driven electric generators (dynamos). The piers combined with a structurally compromised floor slab presented a safety and logistical challenge to characterizing material below the cellar floor. This condition made it difficult to thoroughly assess the structure's foundation elements prior to building demolition. The PCB data presented in the 2009 notification was limited to building material above and including the surface of the cellar slab. To cleanup PCBs from the site NYSDEC awarded Contract No. D007630 to PAL Environmental Services, Inc. (PAL) of Long Island City, New York, and issued a Notice-to-Proceed on July 2, 2014. During the course of building demolition activities previously uncharacterized building material (inaccessible before demolition activities), has been sampled. PAL used a small excavator to remove portions of the cellar slab revealing approximately 6 ft. of brick rubble. For the purpose of creating waste profiles for the brick rubble, ten test pits were excavated (see Figure 1), and two 5-point composite samples were collected from each test pit at depth intervals of 0–3 ft. and 3–6 ft. Of the 20 composite samples collected all the PCB concentrations were less than 50 milligrams per kilogram (mg/kg). After discussing sample results with EPA it was determined that the composite sampling is not appropriate for characterizing PCB remediation waste (Subpart N) and therefore the rubble material will be managed as TSCA waste and be disposed of at TSCA permitted landfill.

2) Proposed Change From The Notification

At the time of the 2009 notification, it was thought that native and/or imported soil material under laid the cellar slab. The plan was to excavate 4 feet (ft.) of soil from under the slab and place a polyvinyl chloride demarcation layer to segregate clean backfill from the potentially impacted sub-slab soil.

Currently, the remediation contractor (PAL) has completed demolition of the superstructure and is working on remediating the brick rubble under the cellar slab. As seen in the attached photographs (Figure 3), there is a minimum of 2.5 ft. of concrete and granite block foundation components covering the southern portion of the building footprint; these foundation components contain less than 1 mg/kg PCBs, and in the northern portion of the building footprint, there is a 50 ft. x 50 ft. granite smoke stack foundation with PCB concentrations less than 1 mg/kg. The plan is to leave the uncontaminated foundation components in place and backfill above them.

As this is a change from the plan submitted to your office in 2009, EA wanted to notify EPA of the revised plan. Furthermore, due to the irregular surface of the different foundation components, the PVC membrane that was to serve as a demarcation layer/device is no longer necessary, and would be difficult to impossible to install over the irregular surface.

3) Request to Treat IRM as Final PCB Cleanup

As mentioned above, current EPA approval is limited to the disposal of PCBs. EA respectfully requests that EPA consider this IRM as the final PCB cleanup of this site. EA is proposing a

cleanup objective of 1 mg/kg. The proposed sampling to verify completion of the PCB cleanup will be performed by sampling on a 20 ft. grid as shown on Figure 2. Samples grids that exceed the cleanup objective of 1 mg/kg will have the entire grid area scarified using either hand held jack hammers or a hydraulic hammer mounted on an excavator then be resampled. In the event that scarification is not effective at achieving the cleanup objective then EPA will be contacted to determine an appropriate course of action.

Please contact the undersigned if you have any questions regarding the attached information.

Sincerely,

EA SCIENCE AND TECHNOLOGY

Robert Conden
Project Engineer

EA ENGINEERING, P.C.

Donald F. Conan, P.E.
Project Manager

Attachments

Cc
Jim Haklar, Ph.D. (USEPA Region 2)
David J. Chiusano (NYSDEC DER)

EE RB CS #16 Cellar TP-9 (0-3') B-1
12/4/2014
2.30 mg/kg
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EE RB CS #17 Cellar TP-9 (3-5') B-1
12/4/2014
0.520 mg/kg

EE RB CS # 11 Cellar TP-7 (0-3') D-2
12/3/2014
3.10 mg/kg
--
EE RB CS #12 Cellar TP-7 (3-6') D-2
12/3/2014
2.30 mg/kg
--
EE RB CS #13 Cellar TP-7 (3-6') D-2 (DUP)
12/3/2014
1.50 mg/kg

EE RB CS #18 Cellar TP-5 (0-2') E-1
12/2/2014
33.00 mg/kg

EE RB CS # 6 Cellar TP-3 (0-3') H-1
12/1/2014
0.960 mg/kg
--
EE RB CS #7 CellarTP-3 (3-6') H-1
12/1/2014
0.200 mg/kg

EE RB CS #1 Cellar TP-1 (0-3') J-2
10/23/2014
0.140 mg/kg
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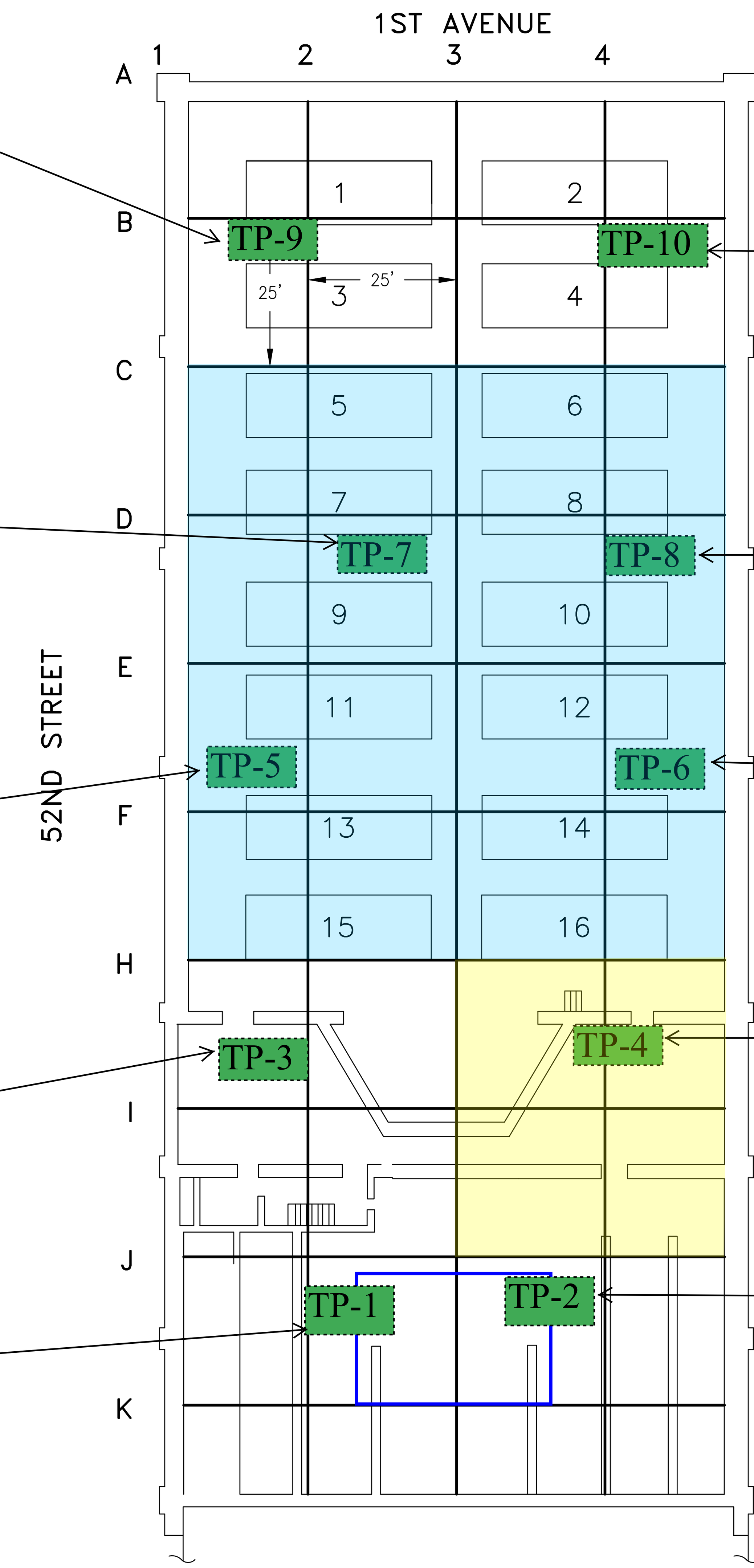
EE RB CS #2 Cellar TP-1 (3-6') J-2
10/24/2014
0.043 mg/kg



EE RB CS #14 Cellar TP-10 (0-3') B-4
12/3/2014
0.310 mg/kg
--
EE RB CS #15 Cellar TP-10 (3-5') B-4
12/4/2014
0.210 mg/kg

EE RB CS #19 Cellar TP-8 (0-1') D-4
12/4/2014
13.00 mg/kg

EE RB CS #10 CellarTP-6 (0-3') E-4
12/3/2014
30.00 mg/kg

EE RB CS #8 CellarTP-4 (0-3') H-3
12/1/2014
0.890 mg/kg
--
EE RB CS #9 CellarTP-4 (3-6') H-3
12/2/2014
30.00 mg/kg

EE RB CS #3 Cellar TP-2 (0-3') J-3
10/23/2014
1.200 mg/kg
--
EE RB CS #5 Cellar TP-1 (0-3') J-2 (DUP)
10/23/2014
0.220 mg/kg
--
EE RB CS #4 Cellar TP-2 (3-6') J-3
10/28/2014
0.290 mg/kg

13.00 mg/kg — Red Text Indicates That 5-Point Composite Sample Of Brick Rubble Below The Raised Cellar Slab Contains PCB Concentrations >10 mg/kg

TP-2 — 2014 Pre-Demolition Test Pit Locations, Wast Characterization Samples Collected As 5-Point Composite Of Brick Rubble Below The Raised Cellar Slab

(yellow) 5-Point Composite Sample With PCB Concentrations >10 mg/kg, Shipped to Waste Management (WM) Grows North/Tullytown Landfills (in PA) as ACM Contaminated PCB Remediation Waste

(blue) Brick Rubble Still On Site, Waste To Ship To EQ (Michigan Disposal Waste Treatment Plant) For Micro-Encapsulation (D008)

20 10 0 20 40
GRAPHIC SCALE IN FEET

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

NO.	DATE	DESCRIPTION
0	10/13	FOR BIDS DUE

REVISIONS

PCB TEST PIT LOCATIONS

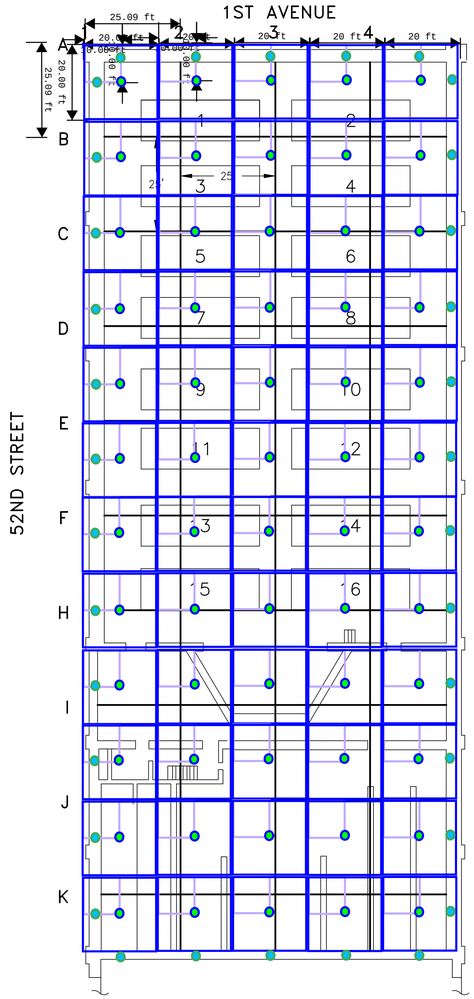
FORMER EMPIRE ELECTRIC SITE NO. 224015
CONTRACT # D007630
BROOKYLN, NEW YORK

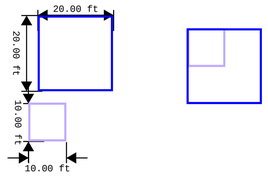
PREPARED BY:
EA ENGINEERING, P.C.
AND ITS AFFILIATE
EA SCIENCE AND
TECHNOLOGY

CARRS#	
EA #	1490706
DESIGN #	
FILE	1490706 Contract.dwg
DRAWN BY	JRM
DATE	OCTOBER 2013
SCALE	AS SHOWN
SS	

SHEET # 1

FILE PATH: F:\STATE & LOCAL\STATE\NDEC\EMPIRE ELECTRIC COMPANY\1447426\FIGURES\FROM SYRACUSE\REVISED FIGURES\SEPT 2013\PCB REMEDIATION CONFIRMATION SAMPLING.DWG [FIGURE 1] MATHER, JASON 3/8/2017 11:52 AM





Bottom Samples (60)

Side Wall Samples (34)

20.09 ft
40 10 0 20 40
GRAPHIC SCALE IN FEET

PREPARED BY:
EA ENGINEERING, P.C.
AND ITS AFFILIATE
EA SCIENCE AND
TECHNOLOGY

Department of Environmental Conservation
NEW YORK STATE OF OPPORTUNITY

NO.	DATE	DESCRIPTION
0	10/13	FOR BIDS DUE

REVISIONS

PCB VERIFICATION SAMPLE LOCATIONS

FORMER EMPIRE ELECTRIC SITE NO. 224015
CONTRACT # D007630
BROOKYLN, NEW YORK

CARRS#	
E.A #	1490706
DESIGN #	
FILE	1490706 Contract.dwg
DRAWN BY	JRM
DATE	OCTOBER 2013
SCALE	AS SHOWN
SS	

SHEET #
2

FIGURE 3

Empire Electric

2017 Photo Summary

Standing outside the building on the corner of 1st Avenue and 52nd Street looking at granite foundation of Pier #1, PCB samples collected from granite and concrete both < 1 mg/kg.

Standing in the building at the corner of 1st Avenue and 52nd Street;
the cellar slab is over 2-feet 5-inches thick.

Photo facing the Party Wall showing granite smoke stack foundation (center) and granite wing wall footers (perpendicular to Party Wall). PCB samples collected from granite foundation components <1 mg/kg.

Close-up view of granite smoke stack foundation.